

The Honorable Thomas S. Zilly

United States District Court
Western District of Washington At Seattle

Peajai Ely,

Plaintiff.

V.

Holland America Line N.V., Hal Antillen N.V., and Holland America Line, Inc.,

Defendants.

No. CV-18-1690- TSZ

Stipulated Motion and Order To Continue Pretrial Deadlines and Trial Date

STIPULATION

Pursuant to the Court's Minute Order Setting Trial Date and Related Dates (Dkt. 16) and Local Rules 10(g) and 16(b), the undersigned parties hereby stipulate and respectfully move the Court for an order continuing the trial date to September 14, 2020, and for a continuation of all related pre-trial dates. The trial date for this case is currently set for March 16, 2019, the expert disclosure deadline is August 26, 2019, and the date for completion of discovery is currently set for November 25, 2019. In support of this Stipulated Motion, the parties state as follows:

1. No prior extensions of the trial date or related deadlines have been requested by either party, and the requested continuance does not result from any lack of diligence on

**Stipulated Motion and Order for
Continuance of Trial Date and Related Dates - 1
Case No 18 - 01690 - TSZ**

Seattle Maritime Attorneys
225 106th Avenue
Bellevue, WA 98004
425-454-3800

the parties' or counsels' part. Counsel for the parties have fostered an amicable working relationship that has served to facilitate discussions throughout this lawsuit. The parties are engaged in the discovery process and are making efforts to efficiently complete discovery, including depositions and the inspection of a busy traveling cruise ship.

2. Good cause exists for the requested continuance because additional time is needed for the completion of further medical treatment by the Plaintiff, and discovery concerning Plaintiff's ongoing medical condition. The parties are also attempting to schedule the inspection of the traveling cruise ship whereupon Plaintiff's alleged injuries occurred. Further, defendants' lead counsel in this matter recently experienced unexpected injuries requiring medical treatment that also may interfere with the parties' ability to complete expert disclosures and discovery by the existing deadlines.

3. For these reasons, the parties respectfully request the Court continue the trial date until September 14, 2020, or to a date as soon thereafter as the Court may order, and issue a new Scheduling Order in accordance with the new trial date

Dated this 10th day of June, 2019.

Dated this 10th day of June, 2019.

**Merriam Law Firm
Dba Seattle Maritime Attorneys**

Maltzman & Partners, P.A.

s/JOHN W. MERRIAM
s/John Merriam

s/Jeffrey B. Maltzman
s/Jefferey Maltzman, per authority

John W. Merriam, WSBA #12749
4005 20th Avenue West, Suite 110
Seattle, Washington 98199
Telephone 206.729.5252
Facsimile 206.729.1012
E-mail:john@merriam-maritimelaw.com

Jeffrey B. Maltzman, WSBA#52051 & CASB#131758
Edgar R. Nield, WSBA #53297 & CASB #135018
Physical Address: 506 2nd Avenue, Suite 1400
Seattle, WA 98104
Mailing Address: 679 Encinitas Blvd #201
Encinitas, CA 92024

**Stipulated Motion and Order for
Continuance of Trial Date and Related Dates - 2
Case No 18 - 01690 - TSZ**

SEATTLE MARITIME ATTORNEYS
225 106th Avenue
Bellevue, WA 98004
425-454-3800

1 Attorney for Plaintiff

Telephone: 760.942.9880
2 Facsimile: 760.942.9882
3 E-mail: jeffrey@maltzmanpartners.com
4 E-mail: edn@maltzmanpartners.com
Attorneys for Defendants

Webb Law Firm
Dba Seattle Maritime Attorneys

5 *S/GORDON WEBB*

6 Gordon C. Webb, WSBA # 22777
7 225 106th Avenue NE
8 Bellevue, Washington 98004
9 Telephone 425.454.3800
Facsimile 425.307.6446
E-mail Gordon@webblawfirm.net

10 Attorney for Plaintiff

11

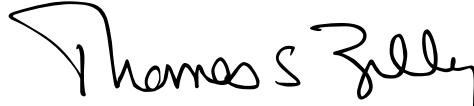
12 **ORDER**

13 THIS MATTER having come before the Court upon the stipulation of the parties,
14 docket no. 17,

16 **IT IS HEREBY ORDERED** that:

17 1. The trial date in this matter be continued from March 16, 2020, to
18 September 14, 2020; the Clerk shall issue a new minute order setting forth the new pretrial
19 deadlines pursuant to FRCP 16(b).

21 DATED this 13th day of June, 2019.

22 
23

24 Thomas S. Zilly
United States District Judge

Presented By:

s/Gordon Webb

GORDON C. WEBB, WSBA # 22777
225 106th Avenue NE
Bellevue, WA 98004
Telephone: 425.454.3800
Fax: 425.307.6446
E-mail: gordon@webblawfirm.net
Attorneys for Plaintiff

Approved by, Copy Received:

S/ *Jeffrey B. Maltzman*, PER EMAIL AUTHORITY

Jeffrey B. Maltzman, WSBA#52051 & CASB#131758
Edgar R. Nield, WSBA #53297 & CASB #135018
Physical Address: 506 2nd Avenue, Suite 1400
Seattle, WA 98104
Mailing Address: 679 Encinitas Blvd #201
Encinitas, CA 92024
Telephone: 760.942.9880
Facsimile: 760.942.9882
E-mail: jeffrey@maltzmanpartners.com
E-mail: edn@maltzmanpartners.com
Attorneys for Defendants

**Stipulated Motion and Order for
Continuance of Trial Date and Related Dates - 4
Case No 18 - 01690 - TSZ**

SEATTLE MARITIME ATTORNEYS
225 106th Avenue
Bellevue, WA 98004
425-454-3800